UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

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| UNITED STATES OF AMERICA, Plaintiff, vs. 33.92536 ACRES OF LAND, MORE OR LESS, SITUATED IN VEGA BAJA, COMMONWEALTH OF PUERTO RICO, AND JUAN PIZA BLONDET, AND UNKNOWN OWNERS Defendants. | CIVIL NO. 98-1664 (CCC)<br>CIVIL NO. 98-2344 (CCC)<br>Consolidated Cases |

PLAINTIFF'S UNOPPOSED MOTION FOR STAY OF RULING AND FOR BRIEFING ON THE RELEVANCE AND EFFECT OF DEFENDANT'S NEWLY PRODUCED DOCUMENTS

Plaintiff United States hereby respectfully moves this Court to stay its ruling on the pending Motion to Determine Proper Appraisal Approach so that the parties may brief the issue of whether the documents recently produced by Defendant landowner Juan Piza-Blondet should affect the determination of the proper appraisal approach in this case. The United States has asked its appraiser and land use experts to analyze these newly produced documents in order to assess whether they constitute evidence that the potential use of medium density housing was reasonably practicable, reasonably probable, and lawful within the near future of the date of taking. See United States v. 7.92 Acres of Land, 769 F.2d 4, 10 (1st Cir. 1985). The United States proposes to submit its brief on the significance of these documents, including an analysis of whether these documents affect the legal permissibility of medium density housing development in light of other applicable restrictions such as wetlands regulations and flood prone zone regulations, within thirty days of filing this motion.

Respectfully submitted this 9th day of March 2005.

Counsel for Plaintiff United States

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**CERTIFICATE OF SERVICE**

I hereby certify that on this 9th day of March, 2005, a true and correct copy of the foregoing Plaintiff's Unopposed Motion for Stay of Ruling and for Briefing on the Relevance and Effect of Defendant's Newly Produced Documents was served via facsimile and by U.S. Mail addressed to:

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